COMMUNICATIONS STRATEGY FRIDLEY SUPERFUND SITES ANOKA COUNTY, MINNESOTA



U.S. ENVIRONMENTAL PROTECTION AGENCY REGION 5 CHICAGO, ILLINOIS OCTOBER 2012

US LPA RECORDS CENTER REGION 5

1.0 Introduction

It is the goal of the EPA to coordinate all communication efforts for the Fridley sites with all of the involved agencies. There are five superfund sites in this town. The sites have different lead agencies but the EPA superfund program is ultimately responsible for ensuring these sites receive the appropriate amount of community involvement. The purpose of this communications strategy is to present the agencies with a plan to assess and address all of the community involvement issues related to Fridley Superfund sites. The sites covered by this communications strategy include Navy Industrial Reserve Ordnance Plant (NIROP) Site, FMC Corporation – Fridley Plant (FMC Corp.) Site, Kurt Manufacturing Company (Kurt) Site, Boise Cascade/Onan Corporation/ Medtronics Incorporated (Boise Cascade) Site, and Fridley Commons Park Well Field Site. This is a working document and should be updated as the communication strategy evolves at these sites. This is not a community involvement plan and is not a public document. It serves only to coordinate the community involvement activities of EPA, Minnesota Pollution Control Agency (MPCA), and the U.S. Navy as it pertains to the Superfund sites in Fridley, MN.

2.0 Fridley Community Description

Fridley is located in Anoka County, Minnesota. The population was 27,208 at the 2010 census. Fridley was incorporated in 1949 as a village and became a city in 1957. It is part of the Twin Cities Metropolitan Area. Fridley has the nickname "Friendly Fridley". The city festival is called "49'er" days, which commemorates the 1949 incorporation. It is usually held in mid June. Fridley borders Minneapolis at its southern border. It borders the cities of Coon Rapids and Blaine to the north; Spring Lake Park to the northeast; Mounds View and New Brighton to the east; Columbia Heights to the southeast; Minneapolis to the southwest; and Brooklyn Park and Brooklyn Center to the west.

According to the United States Census Bureau, the city has a total area of 10.9 square miles (28 km²), of which, 10.2 square miles (26 km²) of it is land and 0.7 square miles (1.8 km²) of it (6.70%) is water. City lakes include East Moore Lake, West Moore Lake, and Locke Lake. Rice Creek flows through the central part of the city, Springbrook Creek flows through the northwest section, and the Mississippi River borders Fridley to the west.

According to the census of 2010, there were 27,208 people, 11,556 households in the city. The racial makeup of the city was 75.2% White, 11.1% African American, 0.01% Native American, 4.9% Asian, 1.3% Pacific Islander, and 4.2% from two or more races. Hispanic or Latino of any race were 7.3% of the population.

In the city the population was spread out with 23.5% under the age of 18 and 14.2% who were 65 years of age or older. The median age was 38 years. The median income for a household in the city was \$51,656. Fridley is located in Minnesota's 5th congressional district, represented by Minneapolis lawyer Keith Ellison, a Democrat. Scott Lund is the current Mayor, first elected in 2000.

3.0 Superfund Sites

3.1 NIROP

The Naval Industrial Reserve Ordnance Plant (NIROP) site is an 83-acre site located about 700 feet from the Mississippi River in Fridley, Minnesota. The U.S. Navy and its contractors have produced advanced weapons systems at the facility since 1940. In 1981, trichloroethylene (TCE) was discovered in on-site groundwater wells and in the city of Minneapolis's drinking water treatment plant intake pipe, which is located in the Mississippi River about 1,500 feet downstream from the site. In 1983, investigations identified pits and trenches in the "North 40" area of the NIROP site where drummed wastes had been improperly disposed of. Contaminated soil and drums have since been excavated from the "North 40" area and properly disposed of offsite.

Groundwater and soil at the NIROP site are contaminated with solvents such as TCE and methylene chloride. Polycyclic aromatic hydrocarbons (PAHs) were also detected in subsurface soil. Potential health risks exist for individuals who ingest or come into direct contact with contaminated groundwater or soil. Because the site is fenced and no private wells are located in the nearby area, no residents are currently being exposed to the contaminants. VOCs above MCLs have not been detected in the drinking water from the city of Minneapolis water intake pipe in the Mississippi River since the 1980s.

Investigations indicated that groundwater originating from the site and contaminated primarily with trichloroethene (TCE) was flowing into the Mississippi River at TCE concentrations above the Safe Drinking Water Act set the maximum contaminant limit (MCL) for TCE (5 ppb). Concentrations of TCE in area monitoring wells adjacent to the river have since decreased to levels generally ranging between 100 to 400 ppb from 37,000 ppb in the late 80's.

The property is being used as a manufacturing facility. The third five-year review was completed in 2008. The remedy at the site was found to be protective of human health and the environment in the short term. Several issues raised in the 2008 five-year review concerning the improvement of the long-term effectiveness of the groundwater remedy are now being addressed by the U.S. Navy under EPA and MPCA oversight. The next five-year review will be completed in October 2013.

3.2 FMC Corp

The FMC Corp. Fridley Plant site is being addressed by potentially responsible party (PRP) actions under state and federal oversight. The 18-acre FMC Corp. Fridley Plant (FMC) site is located in Anoka County, Minnesota, several hundred feet east of the Mississippi River. Solvents, paint sludge, and plating wastes were generated and disposed of in an on-site dump from the 1940s until 1969. Minnesota Pollution Control Agency (MPCA) staff sampled site surface and groundwater in the early 1980s and confirmed that ground and surface water were contaminated by industrial solvents. In the 1980s, solvents from the site were detected in the city of Minneapolis drinking water system intake that is located downgradient of where the FMC site groundwater contaminant plume enters the river.

To address this, the Minneapolis surface water intake was moved further downstream and into the center of the river. Regular sampling of the water from the intake has shown no exceedences of contaminants since the 1980s. Because of the threat posed to Minneapolis drinking water, this site received one of the highest Hazard Ranking System scores of all sites on the National Priorities List (NPL). However, that threat was mitigated by relocating the intake. Cleanup work at the FMC site was initiated in the 1980s, and the groundwater extraction wells that were installed as part of the remedy have been in operation since that time.

FMC site groundwater is contaminated with volatile organic compounds including TCE. Soil that was excavated in the 1980s was also contaminated with TCE. The main health risk at the FMC site would be if someone were to use contaminated groundwater as a drinking water supply. TCE believed to be from the site was detected in high concentrations in groundwater wells located near the Mississippi River and is believed to have contributed to the detection of VOCs in the Minneapolis drinking water supply intake in the 1980s. However, the surface water intake was moved further downstream and no exceedences of VOCs have been detected in the intake since that time. In addition, because no private drinking water wells are in the area, no residents are directly exposed to the contaminants in the site groundwater.

The site continues to be used as a manufacturing facility (BAE Systems). Because contamination still exists on the site, by law, the remedy must be reviewed every five years to ensure that it is still protective. Five-year reviews were completed by MPCA in 1999, 2004 and 2009. The next review will be conducted in 2014. No issues with the remedy's short-term protectiveness have been identified in any of the five-year reviews. The remedy continues to be protective of public health and the environment

3.3 Kurt

The 10-acre Kurt Manufacturing (Kurt) site is located one mile from the Mississippi River in Fridley, Anoka County, Minnesota. Kurt has been machining and fabricating metal components since 1960. Industrial solvent was spilled into a drainage pit beneath the company's metal shavings bin storage area. A 140-foot deep groundwater well, which is used for industrial and potable purposes, is screened in bedrock in the Prairie du Chien formation. Sampling results showed tetrachloroethene (PCE) contamination in the groundwater. The site is an industrial property and has neighboring industrial and residential areas. Over 163,000 people live within one mile of the site.

The Kurt site was placed on the Superfund NPL in October in June 1986. The Kurt Manufacturing site is being addressed through PRP actions under federal and state oversight.

Groundwater and soil at the site were contaminated by PCE, trichloroethane, cis-1,2-dichloroethylene, and trichloroethene (TCE). Prior to any cleanup work being taken (see Cleanup Progress, below), direct contact or accidental ingestion of contaminated soil or groundwater could have posed a human health risk. Currently, surface soil has been cleaned up but dissolved contaminants remain in site groundwater.

Kurt constructed a pump-and-treat system in 1986 to clean up contaminated groundwater near the site. The system is still operating and it will continue to operate until groundwater cleanup goals are achieved. In 2010, Kurt Manufacturing removed additional soil from the source area and installed a pilot soil vapor extraction (SVE) system. It is hoped that this additional source removal will shorten the length of time that an active groundwater migration control system will need to operate. The site remains an active industrial property. Kurt Manufacturing has operated a precision machining and metal fabrication facility at this location since 1960.

3.4 Boise Cascade

The Boise Cascade/Onan/Medtronics site covers 183 acres in Fridley, Minnesota. The National Pole and Treating Company and later the Minnesota and Ontario Paper Company treated wood from 1921 until 1961 at this location. Operations at the site first used creosote to treat wood for railroad ties and for utility poles. The company began using pentachlorophenol (PCP) to treat its wood products in 1958 and continued this practice until 1961, when all operations stopped. In 1965, the Minnesota and Ontario Paper Company was purchased and merged into the Boise Cascade Company. Approximately 3,000 people lived within one mile of the site. Several residences were located within 500 feet of the site. Two elementary schools and several small urban parks were located within one mile of the site at the time of the investigation. Groundwater contamination from the site was a major concern because the towns of Fridley and Moundsview use water drawn from municipal wells located near the site.

This site was addressed through federal, state, and potentially responsible party (PRP) actions. The EPA detected high levels of organics, including creosote and phenols, in on-site groundwater monitoring wells, sediments, and soils. Long-term groundwater monitoring continues through the present. The monitoring indicates the contaminant plume is decreasing in lateral and vertical extent. There are no known drinking water wells that are impacted by the contaminant plume.

On the Onan property, the work included: (1) a slurry wall containment system constructed around the former retort building into which excavated contaminated soil was placed; (2) a cap was constructed over the area surrounded by the slurry wall; (3) dewatering; and (4) treatment of the water prior to discharge. On the Medtronic property, where two wastewater lagoons had been operated, contaminated soils were excavated and disposed of off-site. Groundwater that was in contact and directly beneath contaminated soil was collected, treated, and discharged. About 5,000 gallons of oil was collected and disposed of off-site. For both properties, long-term groundwater monitoring was undertaken. Sampling has demonstrated that contaminants have either been removed from the site or confined within the containment vault. Work was completed in 1986 and the site was deleted from the National Priorities List in early 1995.

3.5 Fridley Commons Well Field

The Fridley Commons Park Well Field Site (Site) is located in the city of Fridley, Minnesota. The Site is located approximately one mile east of the Mississippi River, one mile south of Rice Creek, and approximately 0.2 miles northeast of Moore Lake. The Site is about 50 acres in area. Surrounding land use is largely residential along with commercial/industrial businesses. The City of Fridley receives its municipal water supply from 13 municipal wells, 8 of which are located

within the park along with a water treatment plant. The water supply provides water to a population of about 29,000 people.

The Fridley municipal water supply system is also supplemented by an interconnection to the New Brighton municipal water system. Primarily during the winter months, the interconnection provides excess water from the water treatment system installed at the Twin Cities Army Ammunition Plant.

The source of contamination which had impacted the well field has never been identified. The city has been monitoring groundwater water quality on a regular basis. Drinking water with contaminant concentrations below the maximum contaminant level (MCL) do not pose unacceptable risks to public health from the exposure to TCE.

This site is being addressed through federal and state actions. The State of Minnesota through the Minnesota Pollution Control Agency (MPCA) is the lead regulatory agency on this site with support provided by EPA.

There has been little community interest in the site until 2012 when the Minnesota Department of Health (MDH) reported cancer rates in Fridley were higher for some cancers than the state expected rates. MPCA, MDH, the City of Fridley and EPA have increased activities to inform the public about contamination and exposure from this Site and other National Priorities List sites in Fridley and surrounding communities.

4.0 Key Stakeholders

Community Stakeholder	Contact Person	Interests	
Fridley Cancer Cluster	Jason McCarty	Establish a Community Advisory Group	
	(Facebook Group)	Remove all contamination from groundwater	
City of Fridley	Mayor Scott Lund	nd Transparency.	
	(763)571-0214	They believe the city water is safe.	
	Dr. Bill Burns		
'	(763) 572-3506		
Senators Goodwin and Franken			

5.0 Communication Approach for Fridley Sites

EPA will conduct community involvement activities that will include both multiple site outreach and site-specific outreach as necessary. A review of the historical community outreach activities has shown that key activities were never performed at this site. These activities include establishment of an information repository, community interviews and a community involvement plan. Although much of the superfund site work has been completed at many of these sites, there is still community interests. EPA seeks to involve the community and put the necessary community involvement infrastructure in place.

There will be one contact person for community involvement from EPA and MPCA to address the Superfund Site community involvement needs in Fridley. When multiple site outreach is being conducted all of the agencies will be involved in community outreach activity. If there is site-specific community outreach that is necessary, only the agencies responsible for that site will be involved.

5.1 Multiple Site Community Involvement

There are five Superfund site in Fridley, MN. These sites are within the same area and have similar contaminants. In general, when conducting community outreach at a Superfund site, EPA would create site-specific community involvement plan that assesses the community's concerns about the Site, seeks to understand the best way to communicate information, and provides information to both the community and EPA about the community involvement opportunities available to the public. The plan would be specific the community and to the site. In the case of Fridley, the same community has multiple Superfund sites. A community involvement plan and community outreach activities could be created for each site but the plans would probably be very redundant and make involving the community very confusing. The community is concerned about more than one, if not all of the Superfund sites, so the community involvement plan and community involvement activities should be community specific with slight modifications depending on the site-specific activities.

Community involvement tools that would be suitable for a single community with multiple sites include community interviews, community involvement plan, fact sheets, mailing lists, community advisory group, public meetings or availability sessions, etc. The formation of a CAG for this area will vastly improve the communication effectiveness in this area because the CAG will provide a single contact point for the community. This contact point will be able to help EPA deliver important information to the community from a trusted source.

5.2 Site Specific Community Involvement

The five superfund sites are in different stages of the superfund process. It will be necessary to do community involvement on a site-specific basis to ensure the community involvement requirements are met for that particular phase. For instance, if EPA or a federal facility is conducting a public meeting for NIROP, the fact sheets and public notices will only focus on that particular site. The advertisement and community involvement activities will be sure to inform the CAG, RAB, and all the citizens but the outreach material will be site-specific.

6.0 Issues and Recommendations

There is not a central communications strategy. There are three agencies working on Superfund sites in the City of Fridley. In order to more effectively communicate with this community we need to create a strategy to coordinate the multi-site messages and the site-specific messages with the appropriate agencies.

Fridley Cancer Cluster would like to start a CAG. There is a facebook group called the Fridley Cancer Cluster (FCC). This group believes that there is a cancer cluster in the town of Fridley. The Minnesota Department of Public Health concluded that there was not a cancer cluster after they reviewed the case. The community was not satisfied with this determination and got Erin Brocavitch involved. This

community group has requested that EPA help them start a CAG. We can organize a CAG workshop for the community in late January.

An EPA website has not been established. All of the sites in Fridley have an NPL fact sheet available on line but they do not have websites. EPA can create a single website for all of the Fridley sites with links to the individual NPL fact sheets. Websites generally have site updates and include site documents and fact sheets that the community can download. We can add the most basic documents for each of the sites.

A community involvement plan has not been written. Community involvement plans or (CIPs) are generally written at the beginning of the superfund process and then updated throughout the work. The Fridley sites don't have individual CIPs. Creating CIPs for each site is possible but it would be redundant considering that most of the information in the CIP has to deal with the specific community. A CIP that is community specific and addresses both concerns about each individual site and general concerns about all the sites. In order to create this plan EPA will need to conduct community interviews. This will give EPA a better understanding of the community's concerns and will help determine how we address these sites in the future. This communication strategy would need to be updated as we get better information about the community.

The community does not understand the Vapor Intrusion (VI) issues. The community is concerned that since there are VOCs in the groundwater near the site that they may be exposed to the contamination via vapor intrusion. EPA has done an analysis and has determined that there are no vapor intrusion issues in the residential area. There may be an issue with vapor intrusion on the NIROP property. EPA needs to communicate this to the public. EPA, MPCA, and the Navy will finalize and send out a fact sheet to the community about VI.

People do not know where to get information about the site. There does not seem to be any information repositories for these sites. Or at least they are not accessible and well known by the public. EPA will designate one or two information repositories in the area. While conducting the community interviews we will inquire about a good location to house the site documents. Then we will need to publicize the location(s).

Community is concerned that rice creek has never been tested. EPA does not have any reason to believe that the creek would be contaminated with site related contamination. EPA will need to determine if it is willing to take a few samples of the creek. The drawback of taking a few samples would be that the community is not satisfied with the data and we get into an endless loop of taking samples.

Community is concerned about the soil, drinking water, and ground water at Fridley Commons Park Well Field. EPA never sampled the soil in that area. The groundwater was contaminated in the 1980's but has since had no contamination. These particular concerns need to be further assessed and hopefully the CAG will help get these messages across better. The FCC seems to be afraid that the contamination will come back. We can assure them that the water is tested frequently by the City and that if contamination does reach unacceptable levels that EPA will address the issue.

1	There is not a central communications strategy.	Develop a communications strategy	November 2012	
2	Fridley Cancer Cluster would like to start a CAG.	Host a CAG workshop for the residents	January 2013	The CAG should have equal representation from FCC, the city, and other community members.
3	An EPA website has not been established.	Create an EPA website for these sites	December 2012	Joint website with links to NPL fact sheets.
4	A community involvement plan has not been written.	Conduct community interviews and develop a community involvement plan	March 2013	The interviews will help clarify concerns and give us a path forward on the other issues.
5	The community does not understand the VI issues.	Create and distribute a VI fact sheet	December 2012	Keep it short and to the point.
6	People do not know where to get information about the site.	Establish Information Repositories and publicize their locations.	December 2012	Multiple repositories with information from all the sites at each one.
7	Community is concerned that rice creek has never been tested.	Determine if additional sampling would be appropriate to ease concerns	March 2013	Sampling may not satisfy the residents and they may continue to request sampling
8	Community is concerned about the soil, drinking water, and ground water at Fridley Commons Park Well Field.	Verify the concerns with citizens and present information via fact sheet or in CIP to address the concern	January 2012	,

7.0 EPA Community Outreach Tools

7.1 Mailing List

EPA has an extensive mailing list of individuals and organizations. Using several methods, EPA will solicit additional mailing addresses from community members interested in the cleanup. Mailings effectively communicate project and event information to a wide and diverse audience and provide information to community members who do not purchase newspapers, use computers, or have access to the Internet. Methods for increasing the mailing list will include coordination with elected officials using constituent mailing lists, sign-up sheets at public meetings, availability sessions and festivals, and contact with community-based organizations to invite their members to sign up. Community members on the mailing list should notify the community involvement coordinator of any changes to their mailing address.

7.2 Website

Major technical reports and updates on the Fridley sites will be found on EPA websites. Many other sources of information are available through the EPA Web site at www.epa.gov. EPA's web sites provide key resources for accessing both general and site-specific information about the site and the Superfund Alternative Process. Access to EPA's web sites is available through home and public computers. EPA posts updates and major technical reports, generally within five business days of their release. Notice of all public meetings, forums and availability sessions and announcements related to the project are posted. The Web site will continue to be updated and enhanced regularly so that users can easily search for information. EPA will provide links to important project-related information posted on other sites.

7.3 Information Repository

Information repositories are local public buildings such as libraries, community centers or government offices where site-related and supporting documents are available for review All repositories will have printed copies of major documents. Information repositories, as well as most public libraries throughout the site, have public-use computers that provide access to additional information. Information repositories provide accessible public locations where residents can read and copy official documents and other pertinent information about the site, EPA activities, and the Superfund process.

7.4 Community Interviews

Community Interviews are formal information gathering sessions. Typically, they are one-on-one interviews conducted in the citizen's home or office; occasionally, however, phone interviews or Focus Groups may also be appropriate. Community Interviews are a tool to use to help you construct another, more useful tool, a Community Involvement Plan. Community Interviews allow you to gather information about the site's community and to learn what information the community wants from EPA. Community interviews also can yield information valuable to the site team and establish a positive relationship with the community

7.5 Community Involvement Plan

A plan that outlines specific community involvement activities that occur during the investigation and cleanup at the site. The CIP outlines how EPA will keep the public informed of work at the site and the ways in which residents can review and comment on decisions that may affect the final actions at the site. The document is available in the site's information repository maintained by the EPA. The CIP may be modified as necessary to respond to changes in community concerns, information needs and activities.

7.6 Fact Sheets

Fact sheets are brief documents written in plain language, often containing user-friendly graphics (pictures and maps), to help residents understand highly technical reports, concepts and information, and inform the public about upcoming meetings and community involvement opportunities.

Fact sheets provide site-related information and notice of community involvement opportunities in an easy to understand format. Fact sheets will be produced throughout the project design and cleanup process to promote understanding of the cleanup. Fact sheets will be posted on EPA's Web site, made available at public forums and will be mailed to individuals and organizations on the site mailing list. In addition to sending fact sheets via first class mail, EPA will distribute fact sheets at locations in the neighborhood where they can be conveniently picked up by residents. EPA will also develop an e-mail distribution list for interested parties who prefer e-mail. Each fact sheet can be sent to e-mail recipients as a ".pdf" file at the same time the fact sheet is mailed.

7.7 Public Meetings

Public meetings are structured, formal meetings open to the general public, featuring a presentation and interaction with the public. Public meetings are opportunities to update the community on site developments and address community questions, concerns, ideas and comments. EPA schedules, prepares for, and attends all announced meetings. Whenever possible, public notice is given at least 2 weeks before scheduled public meetings. EPA will hold public availability sessions, participate in public forums and

schedule public meetings at key cleanup milestones. The meetings will be announced via newspaper notices, e-mail messages and fact sheets.

7.8 Public Availability Sessions

Public availability sessions are effective, informal sessions open to the public. They feature posters, displays and interaction between EPA staff and the public. These sessions present detailed information in understandable terms, allow individuals to inquire about issues that most concern them, and give each citizen a chance to speak freely to EPA personnel and contractors on a one-to-one basis. Public availability sessions do not require the use of court reporters and transcripts, although meeting summaries may be prepared.

The goal of these sessions is to educate the public on important project issues and to enable community members to ask questions in a comfortable and informal setting. Public availability sessions also provide EPA with feedback from the community and can uncover issues not fully understood by the community. Sessions are conducted as needed at convenient times and places. Whenever possible, public notice is given at least 2 weeks before scheduled public availability sessions.

7.9 Community Advisory Group

The EPA may work with or provide assistance to a CAG on technical issues. This can provide a way for the community to provide input on site technical issues and become more involved in the decision-making process. It also can provide a way for the EPA to explain, in greater detail, the site technical information. Furthermore, involvement with a CAG can provide a forum for the EPA and the various group members to discuss their concerns and learn from each other.

8.0 Key Team Members

8.1 U.S. EPA

Name	Contact Info	Position	Site(s)
Sheila Desai	312.353.4150	Project Manager	NIROP, FMC Corp, and
	desai.sheila@epa.gov		Kurt
David	312.886.7058	Project Manager	Fridley Commons Well
Seeley	seeley.david@epa.gov		Field
Bernie	312.886.4746	Project Manager	Boise Cascade
Shorle	shorle.bernie@epa.gov		
Nefertiti	312.886.6148	Community Involvement	Fridley Sites
DiCosmo	dicosmo.nefertiti@epa.gov	Coordinator	

8.2 Minnesota Pollution Control Agency

Name	Contact Info	Position	Site(s)
Sandeep Burman	651.757.2256	Supervisor	Fridley Sites
-	Sandeep.burman@state.mn.us	,	
Deepa de Alwis	651.757.2572	Project Manager	NIROP, FMC Corp., Kurt
-	Deepa.dealwis@state.mn.us		
Nile Fellows	651.757.2352	Project Manager	Fridley Commons Well
	Nile.fellows@state.mn.us		Field.
Sam Brungardt	651.757.2249	Public Affairs	Fridley Sites
_	Sam.brungardt@state.mn.us		-

8.3 U.S. Navy

Name	Contact Info	Position	Site
Harvey Pokorny	harvey.pokorny@navy.mil 847.688.2600	Project Manager	NIROP
William Couch	willilam.couch@navy.mil 847.688.2600 x 1-200	Public Affairs Officer (Navy Contact for Public)	NIROP .

8.4 Kurt Manufacturing Company

Name	Contact Info	Position	Site
Kelli Watson	763.572.4443	Vice President, Human	Kurt
·	Kelliw@kurt.com	Resources	

8.5 BAE Systems

Name	Contact Info	Position	Site
Douglas L. Hildre, P.E.	763.572.6938	Environmental Affairs	FMC Corp.
	Doug.hildre@bae	Manager	
L	systems.com		